

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

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STUART FORCE individually and as personal
representative of the ESTATE OF TAYLOR FORCE,
et al.,

Case No: 20-cv-2578-BMC

Plaintiffs,

-against-

QATAR CHARITY; QATAR NATIONAL BANK and
MASRAF AL RAYAN,

Defendants.

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**NOTICE OF PLAINTIFFS' EX PARTE MOTION
FOR ISSUANCE OF LETTERS ROGATORY
AND ADJOURNMENT OF PRELIMINARY CONFERENCE**

PLEASE TAKE NOTICE that, for the purpose of effectuating service upon Defendants Qatar Charity, Qatar National Bank and Masraf Al Rayan in the State of Qatar, Plaintiffs through their undersigned counsel will move this Court *ex parte*, before the Hon. Brian M. Cogan, 225 Cadman Plaza East, Brooklyn, Courtroom 8D S, New York 11201 pursuant to 28 U.S.C. § 1781 and Federal Rule of Civil Procedure 4 and upon the accompanying Memorandum of Law in Support of Plaintiffs' *Ex Parte* Motion for Issuance of Letters Rogatory and Adjournment of Preliminary Conference, and the Declaration of Joshua K. Perles executed on September 11, 2020, together with all exhibits thereto, and all prior pleadings and proceedings had herein, to: (1) grant this motion; (2) issue the Letters Rogatory submitted as Exhibits 3-5 to the Declaration of Joshua K. Perles; (3) certify copies of all documents to be served, specifically (a) three copies of the Complaint filed on June 10, 2020 [ECF # 1] and (b) one copy of each of the Amended Summons issued on September 10, 2020 [ECF # 12-14]; (4) adjourn *sine die* the Preliminary Conference in this action currently scheduled for 11:45 a.m. on September 23, 2020 pending the

Court's receipt of notification that all Defendants have been served; and (5) grant such other and further relief as the Court deems just and proper.

Dated: September 11, 2020

Respectfully submitted,

/s/ James P. Bonner
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